

1 Roopal P. Luhana
2 **CHAFFIN LUHANA LLP**
3 600 Third Avenue, Floor 12
4 New York, NY 10016
5 Telephone: (888) 480-1123
6 luhana@chaffinluhana.com

7 Sarah R. London (SBN 267083)
8 **GIRARD SHARP LLP**
9 601 California St., Suite 1400
10 San Francisco, CA 94108
11 Telephone: (415) 981-4800
12 slondon@girardsharp.com

13 Rachel B. Abrams (SBN 209316)
14 **PEIFFER WOLF CARR KANE**
15 **CONWAY & WISE, LLP**
16 555 Montgomery Street, Suite 820
17 San Francisco, CA 94111
18 Telephone: (415) 426-5641
19 rabrams@peifferwolf.com

20 *Co-Lead Counsel for Plaintiffs*

21
22
23
24
25
26
27
28
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
N.D. Cal. No. 23-cv-06708
D. Ariz. No. 25-cv-4276

Case No. 3:23-md-03084-CRB (LJC)

**PLAINTIFF'S FIRST AMENDED TRIAL
EXHIBIT LIST**

Judge: Hon. Charles R. Breyer

PLAINTIFF'S FIRST AMENDED EXHIBIT LIST

Plaintiff is lodging the attached **Plaintiff's First Amended Exhibit List** in accordance with the parties' agreement.

By serving this Exhibit List, Plaintiff does not waive, and expressly reserves, all rights afforded under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Local Rules, and all orders and procedures established by the Court in this action, including the right to amend, modify, withdraw, or supplement Plaintiff's Exhibit List before and during trial. Plaintiff reserves the right to modify, withdraw, or supplement her Exhibit List before and during trial including, but not limited, to the following non-exclusive set of circumstances: (1) to include documents produced untimely in this litigation for trial by an opposing party; (2) upon receipt of Defendants' exhibit lists and/or deposition designations or counter-designations and amendments to deposition designations or counter-designations; (3) in the event that additional relevant documents or materials are produced in this action, identified in supplemental expert reports, or discovered subsequent to the date of service of the exhibit list; (4) for purposes of adding any medical or scientific literature, other data, regulatory filings or communications issued or published after the date of submission of the exhibit list; (5) as required to cure an evidentiary objection; (6) in response to Plaintiff or Defendants proffering any documents they have not listed on their Exhibit Lists; (7) in response to rulings of the Court on any pretrial motions, including any expert motions, motions for summary judgment, motions in limine, or any other Court decisions that affect the scope of this trial; and (8) as necessary based on the future severance, settlement, and/or dismissal involving any party.

The inclusion of any exhibit on this list does not waive or affect any confidentiality designation under the Protective Order. Plaintiff expressly reserves the right to object to the introduction, use, or admissibility of any document listed on any party's Exhibit List. The inclusion of a particular document on Plaintiff's Exhibit List does not waive any right to object to the introduction, use, or admissibility of that document for any purpose. Plaintiff also reserves the right to use any deposition transcripts and any exhibits to deposition transcripts for any witnesses being called to testify at trial and/or use any deposition exhibits or other documents associated with any

1 testimony that has been or will be designated or counter-designated by any party. Plaintiff reserves
 2 the right to use any and all documents or materials listed by any other party, including Defendants.
 3 Certain exhibits that were previously produced during discovery are further identified by bates
 4 number, native file name or description, as applicable. Plaintiff further reserves all rights to use
 5 documents de-designated and/or redacted, initially withheld for privilege, and subsequently
 6 produced by Defendants pursuant to Judge Cisneros' and Judge Jones' Orders including the most
 7 recent Orders. Plaintiff expressly reserves the right to use alternative copies of such exhibits where
 8 appropriate, including physical, color, redacted, more legible, and/or native documents, or copies
 9 with or without deposition exhibit stickers. Plaintiff also reserves the right to use at trial summaries
 10 created in accordance with the federal rules and demonstrative exhibits, including without
 11 limitation: charts, graphs, photographs, animations, timelines, objects, models, PowerPoint slides,
 12 drawings, graphics, and other demonstrative aids. Plaintiff reserves the right to offer enlargements
 13 of any exhibits on the list or on any party's exhibit list.

14
 15 DATED: January 6, 2026

Respectfully submitted,

16 By: /s/ Sarah R. London

17 SARAH R. LONDON (SBN 267083)
 18 ANDREW R. KAUFMAN (*Pro Hac Vice*)
 19 GIRARD SHARP LLP
 20 601 California St., Suite 1400
 21 San Francisco, CA 94108
 Telephone: (415) 981-4800
 Email: slondon@girardsharp.com
 akaufman@girardsharp.com

22 RACHEL B. ABRAMS (Cal Bar No. 209316)
 23 ADAM B. WOLF (Cal Bar No. 215914)
 24 SARA B. CRAIG (Cal Bar No. 301290)
 PEIFFER WOLF CARR KANE CONWAY
 & WISE, LLP
 25 555 Montgomery Street, Suite 820
 26 San Francisco, CA 94111
 Telephone: 415.766.3544
 Facsimile: 415.840.9435
 27 Email: rabrams@peifferwolf.com
 awolf@peifferwolf.com
 28 scraig@peifferwolf.com

ROOPAL P. LUHANA (*Pro Hac Vice*)
CHAFFIN LUHANA LLP
600 Third Avenue, Fl. 12
New York, NY 10016
Telephone: (888) 480-1123
Email: luhana@chaffinluhana.com

Co-Lead Counsel for Plaintiffs

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing.

Dated: January 6, 2026

/s/ Roopal Luhana

Roopal Luhana